



PRESERVATION ACTION COUNCIL OF SAN JOSE

Dedicated to Preserving San Jose's Architectural Heritage

July 28, 2011

John Davidson, Senior Planner
Department of Planning, Building and Code Enforcement
200 E. Santa Clara Street
San Jose, CA 95113-1905

Dear Mr. Davidson,

The Preservation Action Council of San Jose (PAC*SJ) is pleased to have this opportunity to comment on the Envision 2040 Environmental Impact Report. Our comments are generally confined to Section 3.0 - 3.11 Cultural and Paleontological Resources.

The *Summary of Impacts and Mitigation Measures* does not include any "Significant Unavoidable" impacts for Cultural or Paleontological resources. That is because the premise of the Envision 2040 EIR is that the proposed plan will be "self-mitigating since it incorporates policies and actions to implement the identified mitigation and avoidance measures for future projects that are consistent with the General Plan" (Page 134). This premise will be true as long as proposed development is consistent with the adopted 2040 General Plan and all of the policies contained in Section 3.11 are implemented.

However, successful protection of historic resources will also require the completion of the City's Historic Resources Inventory. The EIR admits that the Inventory is incomplete and that this EIR only deals with "identified" or "known" resources, and there is "much that is not known" (Page 694). That is an inadequacy in the EIR that cannot be corrected until all of the cultural and historic resources have been successfully identified. The EIR emphasizes that the City needs to identify the resources and funding to complete the Historic Resources Inventory. PAC*SJ strongly supports this recommendation.

The Envision 2040 General Plan contains a number of policies to protect cultural and historic structures, districts and archeological areas. It also contains a number of policies that will require those protections as the proposed Urban Villages are created. To the extent possible, and absent specific proposed developments, the EIR has examined the impacts of those policies.

Thank you for the opportunity to comment on the Envision 2040 EIR.

Sincerely,



Brian K. Grayson
Executive Director